MICHOFFICE

Front Royal

To Kr. A. G. Ruff, Jr.

Date August 29, 1978

From R. H. Biggs, Jr.

Score

Resource Conservation and Recovery Act (RCRA)
Re: Memo 8-8-78 Hall to Avery, etal
Memo 8-21-78 Ruff to Biggs

I have reviewed the lists that were included in the referenced memo and we do not seem to be involved.

However, we do have some solid wastes that would fall under the "hazardous" wastes definition. These are:

Ignitable Waste - green staple tow
Corrosive Waste - Viscose basin overflow
Toxic Waste (maybe) - fly ash basin overflow
(red)

At the present time these are not of real concern if proper procedures are followed. Green staple tow must be processed on the waste machine or if sent to the county sanitary fill, must be degassed and washed. As you know fires and explosions have occurred at the sanitary fill when the tow was sent out without degassing and washing. The Viscose basins are decanted through waste treatment. The SVCB has requested an analysis of the fly ash basin overflow and we will have to see what comes out of that.

It might well be that sometime in the future the state or EPA may be questioning whether there is seepage from the fly ash basin and Viscose basins into the river. Our "dump" could also come under scrutiny from the state and EPA.

RHB/mkb

AR200016